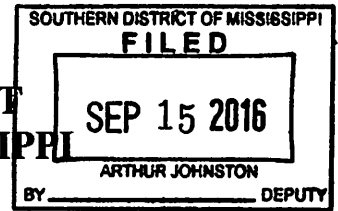


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**



DOUGLAS HANDSHOE

v.

CIVIL ACTION NO. 1:15cv382-HSO-JCG

VAUGHN PERRET, CHARLES LEARY &
DANIEL ABEL, D/B/A/ TROUT
POINT LODGE LTD OF NOVA SCOTIA
& IN THEIR INDIVIIDUAL CAPACITIES
PROGRESS MEDIA GROUP LIMITED,
MARILYN SMULDERS, TORSTAR
CORPORATION, NATIONAL
GEOGRAPHIC SOCIETY INC., & THE
ASHOKA FOUNDATION

MOTION FOR EXTENSION OF TIME TO SERVE PROCESS

COMES NOW INTO COURT, Plaintiff Douglas Handshoe, in his individual capacity and as Publisher of Slabbed New Media, LLC and submits this Motion for an Extension of Time to Serve Process on Defendant Daniel Abel pursuant to Federal Civil Procedure Rule 4(m). Plaintiff files this Motion with accompanying Memorandum pursuant to Local Civil Procedure Rule 7.

BACKGROUND

Plaintiff has hired the investigative firm JSI Investigations of Slidell Louisiana (JSI) multiple times to serve process on Defendant Abel in this and other matters. Abel is currently evading service of process. JSI has been unable to locate Abel at his last known address, 2421 Clearview Parkway in Metairie Louisiana which is a Super 8 Motel. Abel used this address with this Court until approximately October 2015, when mail from the matter styled *Handshoe v Abel*

sent by the Court to Abel at that address was returned.¹ Plaintiff has been serving process upon Abel during various of his scheduled court appearances in the New Orleans metropolitan area Courts as the Super 8 Motel front desk has previously refused on multiple occasions to accept service on his behalf or to summon Abel to the motel common area from the domicile/office at Room 106 which Abel has previously furnished this and other courts as his address prior to October, 2015.²

Abel has abandoned his litigation against instant Plaintiff by refusing to sit for his scheduled deposition in the New Orleans Civil District Court matter styled *Abel on behalf of himself and as Representative Petitioner v Handshoe et al*, despite being compelled by the New Orleans Civil District Court to appear for it and is scheduled to appear in no other litigation as his license to practice law has been suspended by the Louisiana Supreme Court due to the “threat of harm to the public.” Plaintiff and his private investigators continue to diligently attempt to locate Abel for service of process.

¹ See case 14cv159-KS-MTP, ECF numbers 67, 68, 71, 72, 78, 86-90, 95 & 96. Plaintiff has attached ECF #95, a representative specimen as Exhibit 1 to this Motion.

² Abel and Trout Point Lodge, Charles Leary and Vaughn Perret more recently used the Super 8 Motel address in filings with the United States Bankruptcy Court on May 27, 2016. Plaintiff, however, has been advised by JSI that Abel is not domiciled at the Super 8 Motel despite their re-use of that address in their more recent Bankruptcy court filings. (Case Number 15-50963-KMS, ECF Nos. 92-2 and 93-1)

Plaintiff respectfully requests this Court grant him an extension of time to December 15, 2016 to serve the summons for the Second Amended Complaint on Defendant Abel.³

Respectfully submitted this 15th day of September, 2016,

A handwritten signature in blue ink, appearing to read 'Douglas Handshoe', is written over a horizontal line.

Douglas Handshoe
Post Office Box 788
110 Hall Street
Wiggins, MS 39577
(601) 928-5380
earning04@gmail.com

³ After Abel refused to Waive Service pursuant to Federal Rules Plaintiff did serve him with the original and First Amended Complaints on February 26, 2016. Abel did not answer the summons and was subject to default.

CERTIFICATE OF SERVICE

I, Douglas Handshoe, hereby certify that on September 15, 2016, the foregoing was sent for electronically filing by me via the Clerk of the Court using the ECF system which sent notification to all counsel of record upon filing by the Clerk.

Respectfully submitted this 15th day of September, 2016,



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